

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

TARA EDWARDS,

Plaintiff,

v.

SCRIPPS MEDIA, INC., d/b/a WXYZ-TV,
a Foreign Profit Corporation,

Defendant.

Case No. 2:18-cv-10735
Hon. Paul D. Borman

Magistrate Judge
Elizabeth A. Stafford

JURY DEMAND

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Attorneys for Plaintiff

Attorneys for Defendant

PLAINTIFF'S SECOND AMENDED WITNESS LIST

NOW COMES, Plaintiff, Tara Edwards, by and through her counsel, and hereby submits the follow list of witnesses who may be called to testify at the time of trial:

- 1) Tara Edwards, Plaintiff
- 2) Candace Anderson
- 3) Barbara Roethler
- 4) Rhonda Dahl
- 5) Jennifer Dotson
- 6) Dave Manney
- 7) Lisa Gass
- 8) Malcom Maddox
- 9) Sarah Willets- Klinger
- 10) Jeff Vaughn
- 11) Nima Shaffe
- 12) Julie Banovic
- 13) Leonora Vukdedaj
- 14) Jeremy Johnson
- 15) Marlon Falconer
- 16) Glenda Lewis
- 17) David Kalman

- 18) Rev. W.J. Rideout
- 19) Rodney Harris
- 20) Mike Murri
- 21) Ed Fernandez
- 22) Ashley McCuen
- 23) Eloise Jordan
- 24) Brian Lawlor
- 25) Tom Leyden, Jr.
- 26) Kim Yonick
- 27) Dave Giles
- 28) Peter Cousins
- 29) Danyelle Wright
- 30) Michelle Zackay
- 31) Valerie Berry (aka Valerie Morris)
- 32) Erika McDaniel (aka Erika Storrs)
- 33) Timothy Dye
- 34) Jim Kiertzner
- 35) Michele Zakay
- 36) Any and all current or former agents, employees or representatives of the Defendant, Scripps Media, Inc., d/b/a WXYZ-TV.

- 37) Any individual who participated in any investigation relevant to this matter, or interviewed in same.
- 38) Any and all persons identified in any other parties' Witness List.
- 39) Any and all witnesses identified in the discovery conducted in this case.
- 40) Any and all records custodians or witnesses needed to authenticate any exhibit.
- 41) Any and all experts used by either Plaintiff or Defendant in this case, including Dr. Gerald Shiener.
- 42) Any and all rebuttal witnesses.
- 43) Any and all impeachment witnesses.
- 44) All witnesses who are unknown at the present time but will become known during the course of discovery or prior to trial.

Plaintiff reserves the right to amend this Witness List to include additional witnesses learned through discovery or prior to trial and/or to delete or otherwise amend those witnesses identified herein.

Dated this 15th day of January, 2019.

Respectfully Submitted,

MORGAN & MORGAN, P.A.

By: /s/ MICHAEL N. HANNA

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Trial Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of January, 2019, a true and correct copy of the foregoing was filed using the CM/ECF system, which I understand will send notice of same to all counsel of record for Defendant.

/s/ MICHAEL N. HANNA

Michael N. Hanna, Esquire